

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

-----  
This document applies to:

ETHICON WAVE 8 CASES LISTED IN  
PLAINTIFFS' EXHIBIT A (Doc. 6817)

JOSEPH R. GOODWIN U.S. DISTRICT  
JUDGE

**ETHICON DEFENDANTS' NOTICE OF ADOPTION OF WAVE 3 *DAUBERT*  
RESPONSE REGARDING SALIL KHANDWALA, M.D., FOR WAVE 8**

Plaintiffs filed a Notice of Adoption as to the opinion testimony of Salil Khandwala, M.D., in the Wave 8 cases identified in Exhibit A to their Notice. *See* Doc. 6817. In response, Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general causation opinions of Salil Khandwala, M.D. for Ethicon Wave 3 (Doc. 2925) as their response for Wave 8. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 3 response briefing.

Respectfully submitted,

/s/ William M. Gage

William M. Gage (MS Bar No. 8691)  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4561  
[william.gage@butlersnow.com](mailto:william.gage@butlersnow.com)

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar No. 5169)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824

Charleston, WV 24338  
(304) 414-1800  
[srobinson@tcspllc.com](mailto:srobinson@tcspllc.com)

Counsel for Defendants Ethicon, Inc.,  
and Johnson & Johnson

**CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage  
William M. Gage